

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
CHEVRON CORPORATION, :
: .
: Plaintiff, :
: .
-against- : Case No. 11 Civ. 0691 (LAK)
: .
: .
STEVEN R. DONZIGER, et al., :
: .
: Defendants. :
: .
----- x

**PLAINTIFF CHEVRON CORPORATION'S NOTICE OF MOTION TO SANCTION
THE DONZIGER DEFENDANTS FOR DISOBEYING THE COURT'S DISCOVERY
ORDERS**

PLEASE TAKE NOTICE that upon the Declaration of Jefferson E. Bell, dated September 27, 2013, together with the exhibits thereto, and the accompanying Memorandum of Law submitted herewith, Plaintiff Chevron Corporation will move this Court before the Honorable Lewis A. Kaplan, United States District Judge, for an order, pursuant to Rule 37 of the Federal Rules of Civil Procedure and the Court's inherent power, imposing sanctions against Steven Donziger, the Law Firm of Steven R. Donziger, and Donziger & Associates, PLLC for disobeying the Court's discovery orders.

Dated: September 27, 2013
New York, New York

Respectfully submitted,

/s/ Randy M. Mastro
Randy M. Mastro
Andrea E. Neuman
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, New York 10166

Telephone: 212.351.4000
Facsimile: 212.351.4035

William E. Thomson
333 South Grand Avenue
Los Angeles, California 90071
Telephone: 213.229.7000
Facsimile: 213.229.7520
Attorneys for Chevron Corporation